

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL, INC., and  
HONEYWELL INTELLECTUAL  
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1337-JFF

AUDIOVOX COMMUNICATIONS CORP.,  
AUDIOVOX ELECTRONICS CORP., NIKON  
CORPORATION, NIKON INC., NOKIA  
CORPORATION, NOKIA INC., SANYO  
ELECTRIC CO., LTD., and SANYO NORTH  
AMERICA,

Defendants.

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HONEYWELL INTERNATIONAL, INC., and  
HONEYWELL INTELLECTUAL  
PROPERTIES, INC.,

Plaintiffs,

v.

C.A. No. 04-1338-JFF

APPLE COMPUTER, INC.; ARGUS a/k/a  
HARTFORD COMPUTER GROUP, INC.;  
CASIO COMPUTER CO., LTD.; CASIO, INC.;  
CONCORD CAMERAS; DELL  
INC.; EASTMAN KODAK COMPANY; FUJI  
PHOTO FILM CO., LTD.; FUJI PHOTO FILM  
U.S.A., INC.; FUJITSU LIMITED; FUJITSU  
AMERICA, INC.; FUJITSU COMPUTER  
PRODUCTS OF AMERICA, INC.; KYOCERA  
WIRELESS CORP.; MATSUSHITA  
ELECTRICAL INDUSTRIAL CO.;  
MATSUSHITA ELECTRICAL  
CORPORATION OF AMERICA; NAVMAN  
NZ LIMITED; NAVMAN U.S.A. INC.;  
OLYMPUS CORPORATION; OLYMPUS  
AMERICA, INC.; PENTAX CORPORATION;  
PENTAX U.S.A., INC.; SONY

CORPORATION, SONY CORPORATION OF AMERICA; SONY ERICSSON MOBILE COMMUNICATIONS AB; SONY ERICSSON MOBILE COMMUNICATIONS (USA) INC.; TOSHIBA CORPORATION; and TOSHIBA AMERICA, INC.

Defendants.

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HONEYWELL INTERNATIONAL INC., AND HONEYWELL INTELLECTUAL PROPERTIES INC.,

Plaintiff,

v.

CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAYS CO., LTD.,

Defendants.

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C.A. No. 05-0874-JFF

**STATEMENT RELATED TO MOTION OF DEFENDANTS  
CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAYS CO., LTD.  
FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

Pursuant to the Court's Memorandum Order on Summary Judgment, counsel for defendants Citizen Watch Co., Ltd. and Citizen Displays Co., Ltd. (collectively, "Citizen") hereby certify that no genuine issue of material fact exists with regard to the facts argued in support of Citizen's Motion for Summary Judgment of Non-Infringement.

BOUCHARD MARGULES & FRIEDLANDER, P.A.

/s/ David J. Margules

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